

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 7

BRADLEY C. REIFLER

Case No.: 17-35075 (CGM)

Debtor.  
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MARIANNE T. O'TOOLE, AS CHAPTER 7  
TRUSTEE OF THE ESTATE OF BRADLEY  
C. REIFLER,

Plaintiff,

— against —

Adv. Pro. No.: 19-9003 (CGM)

BRADLEY REIFLER, NANCY REIFLER,  
LISETTE ACKERBERG and/or John Doe No.  
1 and 2, as Trustee of the ACKERBERG  
IRREVOCABLE TRUST FBO KELSEY  
REIFLER; BRADLEY REIFLER, NANCY  
REIFLER, LISETTE ACKERBERG and/or  
John Doe No. 3 and 4, as Trustee of the  
ACKERBERG IRREVOCABLE TRUST FBO  
COLE REIFLER; BRADLEY REIFLER,  
NANCY REIFLER, LISETTE ACKERBERG  
and/or John Doe No. 5 and 6, as Trustee of the  
ACKERBERG IRREVOCABLE TRUST FBO  
PAIGE REIFLER; BRADLEY REIFLER,  
NANCY REIFLER and/or John Doe No. 7 and  
8, as Trustee of the BRADLEY C. REIFLER  
CHILDREN'S TRUST; BRADLEY  
REIFLER, NANCY REIFLER and/or John  
Doe No. 9 and 10, as Trustee of the  
BRADLEY REIFLER CHILDREN'S TRUST  
NO. 1; KELCOP LP; KELCOP FAMILY LLC  
a/k/a KELCOP LLC; NANCY REIFLER,  
KELSEY REIFLER; COLE REIFLER; EGIAP  
LLC; POCLEK, LLC; LISETTE  
ACKERBERG, and JOHN DOES 11-20,

AFFIDAVIT

Defendants.  
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STATE OF NEW YORK     )  
                                      )ss.:  
COUNTY OF NEW YORK    )

Nancy Reifler, being duly sworn, deposes and says:

1. I am a defendant in this case. I make this affidavit as required by the Order of this Court. My friends and family call me "Ash", which is a nickname, and I am referred to that way in some matters.

2. Sometime around the fall of 2018 the US Postal Inspectors came to Brad's office in Manhattan and seized all of his files and his computers and whatever else was in the office that they wanted. They then came to Sky Blue Farm, my home in Millbrook, but I was not at home. They gained access to our home, and they took everything that they wanted from our residence. When I returned home, they had turned over mattresses in their search as well as searching everything else in our home. Anything electronic or anything else that they deemed relevant they took from our home. This included devices belonging to Brad and me, as well as papers and documents. I was never given an inventory of what was taken, nor was I given any contact information for who to contact to retrieve what was taken. To this day, I have no idea where the stuff that was taken is located, or who has it. I was not informed of exactly what was taken from our residence, nor was I told where whatever was removed was taken to, or where it is stored.

3. As I testified at trial, I was given the document demands and interrogatories sent by the trustee. I compiled answers and documents dealing with bank accounts that were clearly identified as mine with statements that had my name on it. I have not given any other documents to Michael Siegel, my lawyer, to produce. Moreover, after searching once again to prepare this affidavit, I have nothing else to produce.

4. Nevertheless, I have undertaken the obligations required by the court, and respond hereto to each category.

5. Item #1: **what search of electronic documents and/or files has been conducted:** In fulfilling the courts requests I searched for electronic emails on my Mac computer and my iphone, I also searched texts on my iphone. I searched for key words that reflected or referenced anything having to do with the case using the following key words. My search results yielded nothing that was not already produced.

6. Item #2: **what search terms were used and the results:** Kelcop LP, Kelcop Family LLC, Kelcop, Poclek, Wire, Wire Transfer, Transfer, Trust, Loan, Children's Trust, Ackenberg, Mortgage, and Judgment. I also put in the bank account numbers ending in these four digits – 5617, 6698, 3601, 2485, 9164, 4401, and 6041.

7. Item #3: **what electronic files or communications may have existed during the relevant period of time:** I had computers and phones that had my electronic correspondences, I do not know which devices held which files. The US Postal service took devices from our home as I have identified above.


8. Item #4: **where those files or communications exists, including the names of the individuals and/or entities that have copies or access to those communications:** Other than as identified above, I have no additional information or present knowledge of the location or custodian of the materials taken from me.

9. Item#5: **to the extent any electronic communications, information or documents no longer exists or the Reifler children no longer have access to them, what electronic communications or documents existed or when they were destroyed or otherwise**

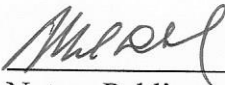
**became unavailable or inaccessible or who has custody or control of such electronic information:** See answers above.

10. To the extent that my cooperation is needed to sign authorizations or other papers to assist the trustee in getting these materials, I am willing to do so. However, the trustee is aware of all of the information in this affidavit, and always had the right to subpoena or otherwise get these materials.

11. I acknowledge that I am required to pay the \$9,958.50 to pay the trustees attorney fees to be compliant with the first order. Yesterday, I sent the trustee by overnight UPS the full amount due in a check made payable to the trustee in the amount of \$9,958.50.

  
\_\_\_\_\_  
Nancy Reifler

Sworn and subscribed  
before me this 25th day  
of January, 2022.

  
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Notary Public

